## Koch, Kristine

**From:** ANDERSON Jim M [ANDERSON.Jim@deq.state.or.us]
**Sent:** Monday, February 25, 2013 4:30 PM
**To:** Humphrey, Chip; Shephard, Burt; GAINER Tom; PETERSON Jenn L; Koch, Kristine; MCCLINCY Matt; poulsen.mike@deq.state.or.us; Robert.Neely@noaa.gov; Sheldrake.Sean@eap.gov; tomd@ctsi.nsn.us; erin.madden@gmail.com; Michael.karnosh@grandronde.org; jpeers@stratusconsulting.com; Bob Dexter; frenchrd@cdm.com; genevieve.angle@noaa.gov; Jessica.Winter@noaa.gov; Allen, Elizabeth; colin@ridolfi.com; AEbbets@stratusconsulting.com; penoyarSJ@cdm.com; Muza, Richard; rose@yakamafish-nsn.gov; Gustavson, Karl; KingTW@cdmsmith.com
**Subject:** RE: Draft agenda for FS work session

Chip,
Your agenda looks good. My only input is 3 things I'd like to make sure we cover during the mtg:

1) Background- What numbers will we use? The upstream background dataset shows a UPL of about 17ppb for PCBs, & a mean of about 5-6ppb. The LWG compares a PH SWAC to that 17ppb, while they should use a PH-maximum detected concentration…, or some at last some type of point-by-point comparison. The LWG essentially…, & inappropriately…, compares a PH-mean to an upstream background UPL. There are other ways to compare site data to background data…, but comparing a mean to a UPL isn't 1 of them.
2) Hot Spots- The LWG says they can't map high-concentration Hot Spots because Hot Spots are based on a multiplier of acceptable-risk levels (ARLs)…, & EPA determines ARLs differently than DEQ. The example the LWG uses is for PCBs. In PH, the LWG evaluated risk based on total PCBs (whether the totals were derived from Aroclor analysis or congener analysis). DEQ typically evaluates risk based on total PCBs, but the LWG cites an example (few & far between) where we based risk on individual congeners. This is a federal Superfund project. I'm OK with using ARLs based on EPA's methodology. I think the LWG or EPA/partners should map Hot Spots based on EPA's methodology to define ARLs.
3) Residual Risk Assessment- "Residual risk assessment (RRA)" is 1 other OR Cleanup Rules ARAR we need to consider. RRAs are cited in OAR 340-122-0084(4) & defined in OAR 340-122-0115(47). I think an RRA should be conducted before a remedy is approved/selected & the RRA should include:
    A) A qualitative assessment of risk from untreated contamination at the conclusion of cleanup.
    B) A qualitative or quantitative assessment of the adequacy & reliability of any institutional controls used to manage untreated contamination. This condition seems to be part of the "effectiveness" & "long-term reliability" balancing factors.

Jim

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**From:** Humphrey, Chip [mailto:Humphrey.Chip@epa.gov]
**Sent:** Friday, February 22, 2013 1:15 PM
**To:** Shephard, Burt; GAINER Tom; PETERSON Jenn L; ANDERSON Jim M; Koch, Kristine; MCCLINCY Matt; POULSEN Mike; Robert.Neely@noaa.gov; Sheldrake.Sean@eap.gov; tomd@ctsi.nsn.us; erin.madden@gmail.com; Michael.karnosh@grandronde.org; jpeers@stratusconsulting.com; Bob Dexter; frenchrd@cdm.com; genevieve.angle@noaa.gov; Jessica.Winter@noaa.gov; Allen, Elizabeth; colin@ridolfi.com; AEbbets@stratusconsulting.com; penoyarSJ@cdm.com; Muza, Richard; rose@yakamafish-nsn.gov; Gustavson, Karl; KingTW@cdmsmith.com
**Subject:** Draft agenda for FS work session

FS team
Attached is a rough draft of the agenda for the FS team work session 2/27 and 2/28. Day 1 is scheduled for 10am to 4pm, Day 2 from 9 am to 3pm at the EPA conference room in Portland, Oregon. The focus of this session is on developing the final COCs, PRGs, and RAls. Some materials will be prepared in advance and other will be developed in the work sessions. A summary and materials will be made available to the full TCT after the meeting.

We’re still tweaking the agenda, and may update prior to the meeting, but the overall timeframe should stay the same.

Let us know if you have any questions.

Chip